

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ILIANA PEREZ, individually, and on behalf
of all others similarly situated,

Plaintiff,

v.

AMERICAN FAMILY INSURANCE
COMPANY, a Wisconsin corporation,

Defendant.

Case No. 1:20-cv-00996

Honorable Charles R. Norgle

Magistrate Maria Valdez

AMERICAN FAMILY’S MOTION TO DISMISS CLASS ACTION COMPLAINT

Defendant American Family Insurance Company (“American Family”), pursuant to Fed. R. Civ. P. 12(b)(6), and for the reasons set forth in the Memorandum in Support filed contemporaneously herewith, respectfully requests that the Court dismiss Plaintiff’s Class Action Complaint (Dkt. 1) in its entirety, and with prejudice, because Plaintiff fails to state any claim against American Family upon which relief may be granted.

Respectfully submitted:

**AMERICAN FAMILY INSURANCE
COMPANY**

BY: /s/ Adam Arceneaux
One of Its Attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, states that on June 18, 2020, he caused the foregoing to be filed with the Clerk of the United States District Court for the Northern District of Illinois, and thus a copy of this pleading will be served on all counsel of record by the Clerk's CM/ECF system.

/s/ Adam Arceneaux

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